

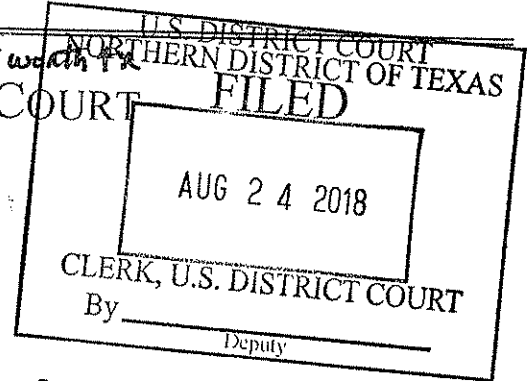
Pro Se 4 (Rev. 12/16) Complaint for a Civil Case Alleging Breach of Contract

501 West 10th Street Rm 310 - Fort Worth TX  
UNITED STATES DISTRICT COURT

for the

NORTHERN District of TEXAS

Civil Division



ZIP ONE MAIL TRANSPORTATION CHARTER

MR. JEROME JULIUS BROWN SR, EIN 30-0492915

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

SANTANDER Holding INC, USA  
PRESIDENT CEO, SCOTT POWELL -  
CHIEF FINANCIAL JUAN CARLOS AVALOS DE SOTO  
P.O. BOX 961 245 FORT WORTH TX 76161

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

INVESTOR RELATIONS @

SANTANDER CONSUMER USA. com

Case No. 18-CV-

(to be filled in by the Clerk's Office)

4-18CV-715-0

Jury Trial: (check one) ☒ Yes ☐ No

US MARSHALS SERVICES 214-767-0836  
US MARSHALS SERVICES 703 837 5500  
CIVIL ACTION 1:18-CV-370, will call  
US District Court Richmond 804 916 2220  
CASE# 3:10-CV-393 USM  
CASE# 3:10-CV-394 UNSEWE  
CASE# 02-05-CV-152 CLERK \$125,000.00  
CASE# 02-05-CV-233 JUDGMENT \$100,000.00

## COMPLAINT FOR A CIVIL CASE ALLEGING BREACH OF CONTRACT

(28 U.S.C. § 1332; Diversity of Citizenship)

### I. The Parties to This Complaint

#### A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	U.S. BOUNTY MR. JEROME JULIUS BROWN SR
Street Address	808 HUNGER FORD DRIVE SUITE (B) #4786
City and County	Rockville - MONTGOMERY
State and Zip Code	MARYLAND 20849-4786
Telephone Number	301-266-5683 - 202-469-9736 - 301-741-3423
E-mail Address	JEROMEJULIUSBROWN@gmail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

## Defendant No. 1

Name	MARIAM, INC
Job or Title ( <i>if known</i> )	DARCARS Automotive Group: T00425 752
Street Address	7550 WISCONSIN AVE NW. SUITE 600
City and County	BETHESDA - MONTGOMERY
State and Zip Code	MARYLAND 20814-3559
Telephone Number	1800-773-0662
E-mail Address ( <i>if known</i> )	

## Defendant No. 2

Name	EASTERN DIVERS Prop INC.
Job or Title ( <i>if known</i> )	DARCARS LINCOLN MERCURY
Street Address	4700 AUTO BAYVIEW AVE
City and County	TEMPLE HILLS PRINCE GEORGES
State and Zip Code	MARYLAND 20748-
Telephone Number	301-899-1100
E-mail Address ( <i>if known</i> )	SILUCAS@DARCARS.COM

## Defendant No. 3

Name	MR. JOHN R. DARUVISH, PRESIDENT
Job or Title ( <i>if known</i> )	DARCARS Automotive Group: T00425 752
Street Address	12210 CHERRY HILL ROAD
City and County	SILVER SPRING - MONTGOMERY
State and Zip Code	MARYLAND 20904
Telephone Number	301-622-0300 FAX 4915
E-mail Address ( <i>if known</i> )	J.DARUVISH@DARCARS.COM

## Defendant No. 4

Name	MR. CHRISTOPHER P. FIARMAN
Job or Title ( <i>if known</i> )	GENERAL COUNSEL, SANTANDER Holding USA
Street Address	P.O. BOX 741
City and County	FORT WORTH
State and Zip Code	TX 76161
Telephone Number	1-888-222-4227
E-mail Address ( <i>if known</i> )	

## II. Basis for Jurisdiction JS-44, CIVIL COVER SHEET, UNITED STATES GOVERNMENT DEFENDANT.

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

### A. The Plaintiff(s)

#### 1. If the plaintiff is an individual

The plaintiff, (name) JENOME JULIUS BROWN,, is a citizen of the State of (name) MARYLAND.

#### 2. If the plaintiff is a corporation

The plaintiff, (name) N/A, is incorporated under the laws of the State of (name) N/A and has its principal place of business in the State of (name) N/A.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

### B. The Defendant(s)

#### 1. If the defendant is an individual

The defendant, (name) PRESIDENT CEO, SCOTT POWELL, is a citizen of the State of (name) TEXAS. Or is a citizen of (foreign nation) N/A.

#### 2. If the defendant is a corporation

The defendant, (name) SCOTT POWELL, PRESIDENT CEO, is incorporated under the laws of the State of (name) TEXAS, and has its principal place of business in the State of (name) TEXAS. Or is incorporated under the laws of (foreign nation) TEXAS A and has its principal place of business in (name) TEXAS.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

### C. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The plaintiff, (name) TEROME JULIUS BROWN SA,, and the defendant, (name) SANTANDER Holding inc - Chief Financial, de soto, made an agreement or contract on (date) 10-14-2014. The agreement or contract was (oral or written) WRITTEN. Under that agreement or contract, the parties were required to (specify what the agreement or contract required each party to do) CONTRACT NOT BOX CHECK ASSIGNED WITH RECOURSE. CONTRACT BREACH CREDITOR - SELLER NO MARYLAND BUSINESS EXPRESS BUSINESS ENTITY OR DEPARTMENT ID NO. UNDER DARCAAS OF BRANCH AVE INC.

The defendant failed to comply because (specify what the defendant did or failed to do that failed to comply with what the agreement or contract required)

TERMS OF THE CONTRACT, NO OTHER OWNER IS A PERSON WHOSE NAME IS ON THE TITLE TO THE VEHICLE BUT, NO SIGNATURE OR ADDRESS - BREACH THE OTHER OWNER AGREES TO THE SECURITY INTEREST IN THE VEHICLE GIVEN TO US IN THIS CONTRACT, NO SIGNATURE OTHER OWNER BREACH OF CONTRACT,

The plaintiff has complied with the plaintiff's obligations under the contract.

### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

## V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 06 29 2018

Signature of Plaintiff

Printed Name of Plaintiff

UNITED STATES LLP, Jerome Julius Brown sr  
UNITED STATES LLP, JEROME JULIUS BROWN SR

### B. For Attorneys

Date of signing: \_\_\_\_\_


Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

 and Zip Code

Telephone Number

E-mail Address

JANICE L. COLE Chief Council

WMATA, METRO TRANSIT POLICE RECUSAL ORDER -

600 FIFTH STREET N.W

DISTRICT OF COLUMBIA 20001

202 962 2550 - 1013

JLCOLE@WMATA.COM

From: Alexus US Couriers Title SENIES  
US Beauty Jerome Julius Brown  
500 North Washington Street #4786  
Rockville MD 20149-4786

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UNITED STATES  
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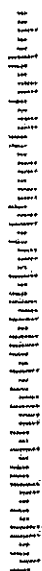
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Fort Worth TX 76102-3673







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